

# **EXHIBIT 3**

**Sarah A. Ramsey**

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**Subject:** FW: Smith: Wiley Deposition

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**From:** Adam Engel [<mailto:aengel@meclaw.net>]  
**Sent:** Tuesday, January 08, 2019 3:51 PM  
**To:** Gerard Pignato PCL <[jerry@rkcglaw.com](mailto:jerry@rkcglaw.com)>; Greg Andrews <[greg@andrews.law](mailto:greg@andrews.law)>  
**Subject:** RE: Smith: Wiley Deposition

Jerry – You should know that our firm intends on calling Mr. Battles at trial. He is on our final witness list. It sounds like this will likely become a subject of at least one pretrial motion. Regardless of what happens down the road, I want you to know you have opportunity to take his deposition after today. If you desire to do so, feel free to provide me with dates.

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